

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	CHAPTER 13
JACQUELINE EVETTE HOLLAND)	CASE: A18-55621-WLH
)	
)	
DEBTOR)	

**CHAPTER 13 TRUSTEE'S SUPPLEMENTAL OBJECTION TO
CONFIRMATION AND MOTION TO DISMISS CASE**

COMES NOW, Nancy J. Whaley, the Standing Chapter 13 Trustee herein, and objects to Confirmation of the plan for the following reasons:

1.

The Debtor's payments under the proposed plan are not current, thus indicating that this plan is not feasible. 11 U.S.C. Section 1325(a)(6).

2.

The plan as proposed will extend to two-hundred and ninety-one (291) months, which exceeds the sixty (60) months allowed by 11 U.S.C. Section 1322(d).

3.

The Debtor has failed to file tax returns with the Internal Revenue Service for the four (4) year period prior to filing in violation of 11 U.S.C. Section 1308. (2017)

4.

The Debtor has failed to provide to the Trustee a copy of the last tax return filed with Internal Revenue Service in violation of 11 U.S.C. Section 521(e)(2)(A).

5.

The Chapter 13 Trustee requests proof of the post-petition mortgage payments in the amount of \$953.00 in order to determine feasibility of proposed plan pursuant to 11 U.S.C. 1325(a)(6).

6.

The Chapter 13 Trustee requests proof of the post-petition homeowner's association payments in the amount of \$121.00 or monthly savings for the payment in order to determine feasibility of proposed plan pursuant to 11 U.S.C. 1325(a)(6).

7.

It appears the monthly expense for the Debtor's lease expense to Compass Self Storage of \$100.00 is less than reflected on the schedules. As such, Debtor is not contributing all projected disposable income to the plan. 11 U.S.C. Section 1325(a)(3) and U.S.C. Section 1325(b)(1)(B).

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of the Debtor's plan, and to dismiss the case.

This the 19th day of July, 2018.

Respectfully submitted,

/s/ _____
Maria C. Joyner
Attorney for the Chapter 13 Trustee
State Bar No. 118350

CERTIFICATE OF SERVICE

Case No: A18-55621-WLH

This is to certify that I have this day served the following with a copy of the foregoing Chapter 13 Trustee's Supplemental Objection To Confirmation And Motion To Dismiss Case by depositing in the United States mail a copy of same in a properly addressed envelope with adequate postage thereon.

Debtor(s)

JACQUELINE EVETTE HOLLAND
9893 VISTA CIRCLE
UNION CITY, GA 30291

By Consent of the parties, the following have received an electronic copy of the foregoing Chapter 13 Trustee's Supplemental Objection To Confirmation And Motion To Dismiss Case through the Court's Electronic Case Filing system.

Debtor(s) Attorney:

SLIPAKOFF & SLOMKA, PC
se@myatlallaw.com

This the 19th day of July, 2018.

/s/ _____

Maria C. Joyner
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